

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNIVERSITAS EDUCATION, LLC,

Petitioner,

: Case No.: 11 CV 1590-LTS-HBP

-v-

NOVA GROUP, INC., as Trustee, Sponsor  
and Named Fiduciary of the CHARTER OAK  
TRUST WELFARE BENEFIT PLAN,

Respondent.

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NOVA GROUP, INC., as Trustee, Sponsor  
and Named Fiduciary of the CHARTER OAK  
TRUST WELFARE BENEFIT PLAN,

Petitioner,

: Case No.: 11 CV 8726-LTS-RLE

-v-

UNIVERSITAS EDUCATION, LLC,

Respondent.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: SEP 30 2013

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**VERIFIED NOTICE OF SUBSTITUTION OF COUNSEL OF RECORD**

Pursuant to Local Rule 1.4, Jack E. Robinson ("Attorney Robinson") hereby provides notice and moves for an Order granting the substitution of counsel for respondent Nova Group, Inc. ("Nova") and the Charter Oak Trust Welfare Benefit Plan ("Trust") in the above-captioned cases, and in furtherance hereof states as follows:

1. Attorney Robinson appeared on behalf of Nova and the Trust on September 5, 2012. (Dkt. No. 149.) On January 25, 2013, the law firm of Brief Carmen & Kleiman, LLP ("Brief Carmen") appeared on behalf of Nova and the Trust. (Dkt. No. 210.)
2. On March 4, 2013, the United States Court of Appeals for the Second Circuit affirmed this Court's denial of Nova's motion to dismiss for lack of subject matter jurisdiction.

3. The case is not scheduled for trial and is currently in post-judgment proceedings, and Attorney Robinson is not asserting or retaining a charging lien.

4. Given the appearance of Brief Carmen, the substitution of counsel will not in any way delay the matter or prejudice the parties.

5. In accordance with Local Rule 1.4, Attorney Robinson is concurrently serving upon Nova and the Trust a copy of this Verified Notice of Substitution of Counsel of Record.

6. Pursuant to 28 U.S.C. § 1746(2), Attorney Robinson verifies under penalty of perjury that the foregoing is true and correct.

WHEREFORE, good cause having been shown, Attorney Robinson respectfully requests that the Court enter an Order approving this Verified Substitution of Counsel of Record in the above-referenced matters and thereby granting the withdrawal of Attorney Robinson.

Dated: Simsbury, CT  
March 7, 2013

Respectfully submitted,

Jack E. Robinson  
Jack E. Robinson (JR5124)  
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SO ORDERED, this 30<sup>th</sup> day of September, 2013.

  
Hon. Laura Taylor Swain  
United States District Judge